

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE: EQUIFAX, INC. CUSTOMER  
DATA SECURITY BREACH  
LITIGATION

MDL DOCKET NO. 2800  
1:17-md-2800-TWT

**FINANCIAL INSTITUTION PLAINTIFFS’  
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

The Financial Institution Plaintiffs<sup>1</sup> move under Rule 23(e) of the Federal Rules of Civil Procedure for final approval of a proposed class action settlement between themselves and Defendants Equifax Inc. and Equifax Information Services LLC.

Under the proposed Agreement, if approved, Equifax will agree to: 1) pay up to \$5.5 million directly to settlement class members who submit valid claims; 2)

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<sup>1</sup> The remaining named Financial Institution Plaintiffs are: Army Aviation Center Federal Credit Union, ASI Federal Credit Union, Bank of Louisiana, Consumers Cooperative Credit Union, Elements Financial Federal Credit Union, Firefly Credit Union, First Financial Credit Union, Halliburton Employees’ Federal Credit Union, Heritage Federal Credit Union, Hudson River Community Credit Union, Peach State Federal Credit Union, SeaComm Federal Credit Union, Services Credit Union, Seven Seventeen Credit Union, Sky Federal Credit Union, State Employees Federal Credit Union (SEFCU), Summit Credit Union, Suncoast Credit Union, The Summit Federal Credit Union, Washington Gas Light Federal Credit Union, and Wright-Patt Credit Union.

spend a minimum of \$25 million over a period of two years towards data security measures pertinent to the Financial Institution Plaintiffs and their claims; 3) pay all reasonable settlement administration and notice costs; and 4) pay reasonable, Court-approved attorneys' fees, expenses, and named plaintiff service awards, up to agreed-upon limits.

The Financial Institution Plaintiffs move for an order: (1) finally certifying the proposed settlement class; and (2) approving the Settlement as fair, reasonable, and adequate.

In further support of their motion, the Financial Institution Plaintiffs submit a memorandum of law and the Declaration of Christopher D. Amundson from the proposed Settlement Administrator, Analytics Consulting LLC.

Plaintiffs respectfully request that this Motion, which Equifax does not oppose, be granted.

Dated: September 21, 2020

Respectfully submitted,

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***Financial Institution Plaintiffs' Steering Committee***

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This brief was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 21<sup>st</sup> day of September, 2020.

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Joseph P. Guglielmo  
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